
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

CASE NUMBER:

MALIK McKEE;
SHUNTINA McKEE; and
WILLIE WOODS

UNDER SEAL

I, the undersigned complainant, being duly sworn on oath, state that the following is true and correct to the best of my knowledge and belief: Beginning no later than in or about April 2012, in the Northern District of Illinois, Eastern Division, and elsewhere, MALIK McKEE; SHUNTINA McKEE; and WILLIE WOODS defendants herein:

conspired with each other and with others known and unknown to knowingly transport an individual who had not attained the age of 18 in interstate commerce with intent that the individual engage in prostitution,

in violation of Title 18, United States Code, Section 2423(e). I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the facts contained in the Affidavit which is attached hereto and incorporated herein.

Signature of Complainant
NIKKOLE ROBERTSON
Special Agent, Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

September 7, 2012 at Chicago, Illinois
Date City and State

ARLANDER KEYS, U.S. Magistrate Judge
Name & Title of Judicial Officer

Signature of Judicial Officer

UNITED STATES DISTRICT COURT)
)
NORTHERN DISTRICT OF ILLINOIS) ss

AFFIDAVIT

I, NIKKOLE ROBERTSON, being duly sworn, state as follows:

1. I am employed as a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed for 7 years. As part of my duties as an FBI Special Agent, I investigate criminal violations relating to crimes against children, including violations of Title 18, United States Code, Section 1591 and 2423(a). I have conducted and participated in numerous investigations related to the sex trafficking of minors.

2. As part of my duties as an FBI Agent, I investigate criminal violations relating to crimes against children, including violations of Title 18, United States Code, Sections 1591 and 2423. I have conducted and participated in numerous investigations related to the sex trafficking of minors. I have participated in the execution of multiple search warrants involving the sex trafficking of minors.

3. This affidavit is submitted in support of a criminal complaint alleging that MALIK McKEE, SHUNTINA McKEE, and WILLIE WOODS have violated Title 18, United States Code, Section 2423(e). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging MALIK McKEE, SHUNTINA McKEE, and

WILLIE WOODS with conspiracy to transport minors in interstate commerce with the intent that they engage in prostitution, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendants committed the offense alleged in the complaint.

4. This affidavit is based on my personal knowledge, interviews with witnesses, recordings, documents, computer evidence, information provided to me by other law enforcement agents, my experience and training, and the experience of other agents.

FACTS SUPPORTING PROBABLE CAUSE

I. Background

5. The FBI is conducting an investigation involving the sex trafficking of minors in the Chicago area. As described below, the investigation has shown that MALIK McKEE, SHUNTINA McKEE, and WILLIE WOODS (“WOODS”) conspired with each other and with others known and unknown to transport juvenile girls, Minors A, B, and C, who were under the age of eighteen, from Iowa City to Chicago by bus, with the intent for Minors A, B, and C to engage in prostitution in Chicago.

6. On April 25, 2012, officers with the Chicago Police Department (CPD) received information about a complaint made by a woman residing in

Cedar Rapids, Iowa (“Individual A”). According to Individual A, her minor daughter (“Minor A”) was missing and believed to be in Chicago, Illinois. According to Individual A, Minor A had called Individual A during the early morning hours of April 25, 2012, and told Individual A that she (Minor A) was being held against her will in the Admiral Hotel in Chicago, Illinois.

7. As a result of the information obtained from Individual A, on April 25, 2012, CPD officers went to the Admiral Hotel located at 9118 S. Cottage Grove Avenue, Chicago, Illinois. According to the officers, when they arrived, they found Minor A in the lobby of the hotel.

8. Minor A agreed to be interviewed. During her interview, Minor A provided information about Minor B and Minor C. Law enforcement subsequently located and interviewed Minor B and Minor C.

9. As set forth below, the statements of Minors A, B, and C, online advertisements in Chicago and elsewhere promoting the prostitution of juvenile girls, hotel records, bus records, the admissions of MALIK McKEE, and other evidence show that MALIK McKEE, SHUNTINA McKEE, and WOODS acted as pimps, posting online advertisements to promote the prostitution of juvenile girls, including Minor A, Minor B, and Minor C.

10. The evidence shows that MALIK McKEE and WOODS posted online advertisements promoting the prostitution of juvenile girls, including Minor A

and Minor B in Iowa City, Iowa. In Iowa City, MALIK McKEE and others arranged for “dates” for Minor A and Minor B, which meant that male individuals came to the house with the intent to have sex with Minors A and B in exchange for money.

11. The evidence further shows that in April 2012, MALIK McKEE and WOODS purchased bus tickets for Minors A, B, and C and transported Minors A, B, and C from Iowa to Chicago with the intent that Minors A, B, and C engage in prostitution in the Chicago area. MALIK McKEE and SHUNTINA McKEE rented various motel rooms in Chicago for the purpose of having the juvenile girls, including Minor A, Minor B, and Minor C, engage in commercial sex acts. The investigation has also shown that MALIK McKEE, SHUNTINA McKEE, and WOODS caused the girls to engage in prostitution, knowing that coercion, force, and the threat of force would be used to cause the minors to engage in a commercial sex act. The investigation has also shown that MALIK McKEE, SHUNTINA McKEE, and WOODS benefitted financially from their participation in this conspiracy.

A. Minor A

12. After CPD officers found her in the lobby of the Admiral Hotel, Minor A¹ agreed to be interviewed. Minor A informed law enforcement that she was born in 1997 and, in April 2012, was fourteen years old. Minor A's guardian and a public records database search confirmed Minor A's age and date of birth. According to Minor A and her guardian, Minor A lives in Cedar Rapids, Iowa.

B. Minor B

13. Minor B was interviewed on May 16, 2012 and June 27, 2012.² During those interviews she informed law enforcement that she was born in 1996 and, in April 2012, was sixteen years old. Minor B's guardian and a public

¹ Agents and officers believe Minor A to be reliable because her account was corroborated by independently-obtained evidence, including the statements of other witnesses, internet advertisements, motel records, and bus records. For example, Minor A stated that "Shuntina" rented motel rooms for the purpose of engaging in prostitution. According to motel records, the room where Minor A was staying was rented under the name SHUNTINA McKEE. In addition, Minor A informed agents and officers that MALIK McKEE and others posted photographs of the minors on backpage.com. Public searches of that website and information obtained pursuant to subpoena confirmed Minor A's statements. Minor A identified herself in photographs in advertisements for escorts posted on backpage.com. I know based on my training and experience that backpage.com is a website used to advertise prostitution under the guise of escort services.

² Agents and officers believe Minor B to be reliable because her account was corroborated by independently-obtained evidence, including the statements of other witnesses, motel records, bus records, internet advertisements, and consensually-recorded conversations. Minor B's account was generally consistent with the information previously provided by Minor A and other sources. For example, as described below, Minor B identified herself in photographs included in escort advertisements posted online in the Iowa City section of backpage.com at the same time she stated she was staying at WOODS's residence in Iowa City.

records database search confirmed Minor B's age and date of birth. According to Minor B and her guardian, Minor B lives in Cedar Rapids, Iowa.

C. Minor C

14. Minor C was interviewed on April 25, 2012. During that interview, she informed law enforcement that she was born in 1995 and, in April 2012, was sixteen years old. Minor C's guardian and a public records database search confirmed Minor C's age and date of birth. According to Minor C and her guardian, Minor C lives in Iowa City, Iowa.

II. Iowa City, Iowa

15. According to Minor A and Minor B, in early April 2012, they took a taxi from Cedar Rapids to Iowa City to meet Minor C. Minor B recalled that she and Minor A arrived in Iowa City on the Saturday before Easter, which was April 7, 2012. According to Minor A, Minor C invited Minor A to join her in Iowa City, and Minor A asked Minor B to come along. According to Minor A and Minor B, MALIK McKEE³ paid their cab fare upon their arrival at WOODS's house.

³Minor A and Minor B identified MALIK McKEE from a law enforcement database photograph.

16. According to Minor A and Minor B, they stayed at WOODS's⁴ house with McKEE, WOODS, Minor C, and others for several days while in Iowa City. According to Minor A and Minor B, while they were at WOODS's house, MALIK McKEE gave Minor A and Minor B alcohol and marijuana.

17. According to Minor A, MALIK McKEE knew that Minor A was fourteen years old when they were staying at WOODS's house. According to Minor A, MALIK McKEE and Minor C told Minor A to say that she was born in 1993.

18. Minor B said that she first informed everyone at WOODS's house, which included MALIK McKEE, WOODS, and Minor C, that she was seventeen years old. According to Minor B, she later told everyone that she was sixteen years old.

19. According to Minor A and Minor B, WOODS and MALIK McKEE took photographs of Minor A and Minor B in lingerie and heels, which MALIK McKEE and WOODS posted online on backpage.com.

20. According to Minor B, WOODS instructed Minor B to wear lingerie for the photographs. Minor B explained that WOODS has a collection of women's shoes for the purpose of taking photographs of women in different

⁴ Minor A identified "Willie" as WILLIE WOODS from a law enforcement database photograph. Minor B also identified WOODS from a law enforcement database photograph.

outfits and footwear. WOODS told Minor B that he wanted the pictures so that he could post them on backpage.com.

21. Photographs of Minor A were used in internet advertisements for escorts posted in the Iowa City escorts section on backpage.com on February 29, 2012 and April 7, 2012.⁵ The February 29, 2012 advertisement is captioned, “Looking for that ****Star**** Action-18.” According to information provided by backpage.com pursuant to a grand jury subpoena, the February 29, 2012 advertisement corresponded to an e-mail address of freakyhornygirls@gmail.com. The name on the invoice was WILLIE WOODS. According to information from backpage.com, the email associated with the April 7, 2012 advertisement was kingluckymst@yahoo.com.

22. Photographs of Minor B, who was dressed in lingerie and posing in sexually-suggestive positions, were posted in an online advertisement in the Iowa City escorts section on the backpage.com on Sunday, April 8, 2012. The advertisement was captioned, “*I need some fun r u down 2 come play??*” The advertisement stated: “Im n the mood 4 fun. I need something 2 make me say yes well I want to make u say the same or I had fun. And will come and get

⁵ Based on my training and experience and information provided by backpage.com, I know that backpage.com requires its users to establish an account by providing an email address and other identifying information before allowing its users to post advertisements online.

some of my time. I want some of yours if you have any. Call XXX XXX-7637⁶ bluebaby im 100% real 100% fun and 100% hot.” The website listed the poster’s age as 18. Identical advertisement were also posted on-line in the Iowa City, Des Moines, and Waterloo adult entertainment sections of backpage.com.

23. According to online searches of backpage.com and information provided by backpage.com, photographs of Minor B were also posted in an online advertisement for escorts on backpage.com on April 8, 2012. The advertisement was captioned, “<3snow bunny new clean upscale hottie <3-18.” According to information provided by backpage.com, the email associated with the account that posted the April 8, 2012 advertisement was kingluckymst@yahoo.com.⁷ The

⁶An online public records database search of telephone number (XXX) XXX-7637 identified that telephone number as belonging to WILLIE WOODS in Chicago, Illinois, with a date of birth of XX/XX/1970 and a social security number of XXX-XX-3620.

According to information provided by backpage.com, telephone number (XXX) XXX-7637 was used as a contact telephone number for advertisements offering escort services as recently as July 3, 2012. One advertisement associated with telephone number (XXX) XXX-7637, was posted on June 29, 2012 at 3:00 a.m. It was captioned, “***AMbEr NeW iN t0wN***--19,” and was posted online in the chicago adult entertainment>chicago escorts section. The advertisement stated: “*hey guys my name is Amber im looking forward to having some fun im 5.3 112 pounds b-size 34b im new in town boys show me a good time my pics are 100% real im not on no b.s. or games can 419 327 7637[.]*” The poster’s age was listed as 19 and the location identified is the northwest suburbs and Elk Grove. According to information provided by backpage.com, the name on the invoice for this advertisement was WILLIE WOODS with an associated email address of williebad36@yahoo.com.

⁷ As set forth above in paragraph 21, the same email address was associated with an online advertisement that used photographs of Minor A and was posted on April 7, 2012 on backpage.com.

name on the invoice for this advertisement was WILLIE WOODS at an address in Iowa City, Iowa.

24. According to Minor A and Minor B, on at least two of the days that they were at WOODS's house in April 2012, MALIK McKEE and Minor C arranged "dates" for Minors A and B, which meant that male individuals came to the house with the intent to have sex with Minors A and B in exchange for money.

25. According to Minor A, on at least one occasion, Minor C was present for sex acts that Minor A performed. On at least one occasion, Minor A saw Minor C place a condom on the male individual, Minor A then had sex with the male individual, and Minor A saw Minor C collect money from the male individual.

26. According to Minor B, MALIK McKEE and Minor C arranged two "dates" for her while she was at WOODS's house. Minor C told Minor B that they would have people come over to have sex for money and that they were not allowed to talk to anyone for free. Minor B collected the money from the dates prior to attempting to perform sex acts for each date and stashed the money in the couch for Minor C to retrieve. According to Minor B, Minor C told Minor B that she (Minor C) gave the money that Minor B had collected from her dates to MALIK McKEE.

27. Minor B said that MALIK McKEE and Minor C directed her to tell her “dates” that she was eighteen years old.⁸

28. According to Minor A and Minor B, Minor C told them that MALIK McKEE was their “daddy.” Minor B said that Minor C explained to her that all of the money that Minor B and Minor C earned on their “dates” would go to MALIK McKEE. Minor C told Minor B that MALIK McKEE would put the money that they earned on their “dates” into a bank account for them to access when they turned 18.

29. According to Minor A, after the first few “dates,” Minors A and B talked to each other about their “dates” and discussed leaving. Minor A heard Minor B then tell MALIK McKEE that she wanted to go home, and heard MALIK McKEE respond, “Naw, bitch, you ain’t going nowhere.”

30. According to Minor A and Minor B, Minor B had sexual intercourse with a teenage boy, whom she had dated previously, while staying at WOODS’s house. According to Minor A and Minor B, Minor C entered the room in which Minor B was having sex with the boy. According to Minor A and Minor B, MALIK McKEE then entered the room and stopped Minor B and the boy. Minor A heard MALIK McKEE scream at Minor B, “You can’t fuck for free. You’re my

⁸In an earlier interview, Minor B stated that she told her first date that she was sixteen.

bitch.” According to Minor B, MALIK McKEE told Minor C to slap Minor B and told Minor B that she was not allowed to have sex for free. According to Minor B, Minor C slapped Minor B in the face.

31. According to Minor B, she knew that MALIK McKEE and Minor C also set up “dates” for Minor A while they were in Iowa City. Minor A was usually in another room with a date, and Minor B saw Minor A walking out of a bedroom with a guy. Minor B overheard Minor C setting up dates for Minor A over the phone. WOODS also told Minor B that ever since he put her (Minor B’s) pictures up on backpage.com, they were getting a lot of calls for dates.⁹

⁹On June 26, 2012, at the direction and in the presence of law enforcement, Minor B placed a consensually-recorded telephone call to (XXX) XXX-7637. According to Minor B, she recognized WOODS’s voice when he answered the call. During the call, WOODS expressed his knowledge and awareness of the online advertisements for escort services that used Minor B’s photographs.

During the conversation, WOODS told Minor B that he needed to use the same email address associated with the account to both post and remove the advertisements. Specifically, the following exchange between Minor B and WOODS occurred. Minor B said, “I said how do you get the pictures off backpage?” WOODS responded, “Uhm, I don’t, I don’t know. I thought they was off already.” Minor B replied, “Nah, I guess not.” WOODS then said, “I’m gonna have to go on there and check then. They shoulda been off. I don’t know why they on there.” Later, in that same telephone conversation, WOODS said, “Right, so, yeah, I’m gonna, uhm, see if I can go in there and try to get all them off and, uhm, ‘cause they should have been off, though, but I don’t know what the fuck’s goin’ on with it.” WOODS explained, “...no, I gotta go, ‘cause there’s an email address that I had to put it on....” Minor B said, “Oh.” WOODS continued: “...so I think they all go back to the email address. So, I gotta find what email address it’s on and take ‘em off. So, yeah, ‘cause they, they should have been off. ‘Cause I don’t know when I kept goin’ through there they was off....”

Minor B was told that Minor A was taking some of her dates when she was unable to take them.

32. According to Minor A and Minor B, Minor A and Minor B had sexual intercourse with MALIK McKEE on separate occasions while staying at WOODS's house in Iowa City. According to Minor A, MALIK McKEE had sex with Minor A to "train her." According to Minor A and Minor B, MALIK McKEE also directed Minor A and Minor B to perform oral sex on Minor C, and Minor A and Minor B complied.

III. Transportation of Minors A, B, and C from Iowa City to Chicago

33. According to Minor B, after a few days and on the last day she was in Iowa City, MALIK McKEE and Minor C told Minor B that they were all going to Chicago. Minor B told MALIK McKEE that she did not want to go, but MALIK McKEE told her that she had no choice.

34. According to Minor B, MALIK McKEE bought bus tickets to Chicago for Minor B, Minor C, and himself. Minor B saw that MALIK McKEE had a stack of money when he gave WOODS some of the money. Minor B said that MALIK McKEE, Minor B, and Minor C took a cab to the bus station, where MALIK McKEE paid for their bus tickets in cash.

35. According to Minor A, MALIK McKEE, Minor B, and Minor C left Iowa City for Chicago without Minor A.¹⁰ According to Minor A, before they left for Chicago, MALIK McKEE and Minor C told Minor A that they were going to Chicago and that she would go the next day. Minor A explained that the next day, WOODS brought Minor A to the bus station, where WOODS bought Minor A's ticket. According to Minor A, WOODS took the bus with her to Chicago and then took the bus back to Iowa City after they arrived in Chicago. According to Minor A, WOODS threatened to beat her if she did not go to Chicago. Records received from Greyhound show that a bus ticket from Iowa City, Iowa to Chicago, Illinois was purchased in Minor A's name on April 10, 2012.

IV. Chicago, Illinois

A. Minor B arrives in Chicago with MALIK McKEE and Minor C.

36. According to Minor B, once she, Minor C, and MALIK McKEE arrived in Chicago, they took a taxi to a motel where they were met by MALIK McKEE's sister, SHUNTINA McKEE,¹¹ Individual B, and a female who used the

¹⁰ In her interview on April 25, 2012, Minor A said that WOODS took Minors A, B, and C to a Greyhound bus station, where MALIK McKEE purchase bus tickets for Minors A, B, and C, and Minors A, B, and C boarded the bus to Chicago. Minor A also said that MALIK McKEE also rode on the same Greyhound bus to Chicago. In a later interview, Minor A clarified that she arrived in Chicago with WOODS and separately from MALIK McKEE and Minors B and C.

¹¹ Minor B identified SHUNTINA McKEE from a law enforcement database photograph.

nickname “Precious.” According to Minor B, the first night in Chicago, everyone drank alcohol and smoked marijuana all night. Minor B said that SHUNTINA McKEE also provided her with ecstasy pills while Minor B was in Chicago.

37. According to Minor B, while they were in a motel in Chicago, SHUNTINA McKEE directed Individual C to take photographs of Minor B, who was wearing lingerie, using SHUNTINA McKEE’s iPad. SHUNTINA McKEE also took photographs of Minor B using the iPad. Minor B later found these photographs online in advertisements for escorts on backpage.com.

38. According to online searches of backpage.com and information provided by backpage.com, photographs of Minor B were posted in online advertisements for escorts in the Chicago escorts section on backpage.com on April 10, 2012, April 12, 2012, and April 13, 2012. The advertisements were captioned, “Ms. Pinky New & Ready Nude Pics 100%% Real Or Free-18.” According to information provided by backpage.com, the email associated with account that posted the April 10, 2012, April 12, 2012, and April 13, 2012 advertisements was boss ladykandi@gmail.com. The name on the invoices for the April 12, 2012 and April 13, 2012 advertisements was SHUNTINA McKEE.

39. According to Minor B, SHUNTINA McKEE asked Minor B how old she was. Minor B originally told SHUNTINA McKEE that she was seventeen. Minor B said that she later told SHUNTINA McKEE that she was sixteen after

Minor B already had several “dates.” In response, SHUNTINA McKEE initially told Minor B that she could get in trouble, but SHUNTINA McKEE never raised this concern again.

40. According to Minor B, she had her first “date” in Chicago the day after she arrived. Minor B explained that she believes that SHUNTINA McKEE arranged her dates in Chicago because she heard SHUNTINA McKEE talking to the dates on the phone and because SHUNTINA McKEE told Minor B when her dates were on their way to meet her (Minor B). When a date arrived, everyone else left the hotel room, and Minor B had sex with the date. Minor B always received the money from her date before having sex, and then Minor B gave the money to SHUNTINA McKEE when she returned to the room.

41. When MALIK McKEE was not around, SHUNTINA McKEE told Minor B that Minor B was working for her. When MALIK McKEE was around, however, Minor B believed that MALIK McKEE was in charge because SHUNTINA McKEE had to tell MALIK McKEE what was going on.

42. SHUNTINA McKEE occasionally allowed Minor B to refuse to take a date. If MALIK McKEE learned that Minor B had refused a date, however, Minor B would get into trouble. For example, after meeting a date in Chicago, Minor B said that she did not want to do the date. SHUNTINA McKEE instead took the date for Minor B. MALIK McKEE told Minor C that Minor C should

“beat the bitch ass,” referring to Minor B, because Minor B did not want to have sex with the date. During that same incident, MALIK McKEE threatened to leave Minor B alone in a bad part of Chicago because Minor B did not want to perform the date.

43. At one point, SHUNTINA McKEE asked Minor B if she would be on her team rather than MALIK McKEE’s team, and Minor B agreed because she thought it would be easier to return home if she worked for SHUNTINA McKEE.

44. When Minor B asked MALIK McKEE if she could go home, MALIK McKEE told her no. Minor B was afraid of MALIK McKEE. While in Chicago, Minor B saw that MALIK McKEE had a gun in his suitcase.

B. Minor A Arrives in Chicago with WOODS.

45. According to Minor B, while she was in Chicago, she received a phone call from Minor A, who was still in Iowa City with WOODS. According to Minor B, Minor A told Minor B that WOODS would not buy Minor A food unless she had sex with him. Minor B said that she put MALIK McKEE on the phone so that Minor A could tell him what was happening. According to Minor B, within a day or two of Minor B’s arrival in Chicago, Minor A arrived.

46. According to Minor A and Minor B, SHUNTINA McKEE picked up Minor A from the bus station and brought her to the hotel, where everyone was smoking marijuana.

47. According to Minor A, once she arrived at the hotel, Minor C told Minor A that she (Minor C) had a “date” for Minor A. As in Iowa City, Minor C was present when Minor A engaged in sexual intercourse with a male in the motel room. Minor A saw the male give money to Minor C. According to Minor A, this same arrangement occurred daily for what seemed like approximately three weeks to a month. According to Minor A and Minor B, nearly every day, MALIK McKEE and Minors A, B, and C moved hotels. Minor A also saw Minor C giving the money from her “dates” to MALIK McKEE.

48. According to Minor A, MALIK McKEE took photographs of Minor A using his cellular telephone. Minor A was wearing her bra and underwear in the photos. According to Minor A, MALIK McKEE then sent the photos to SHUNTINA McKEE, who posted the photographs to backpage.com.¹²

49. According to Minor A and Minor B, MALIK McKEE did not permit them to leave the motel rooms unless everyone was leaving together or when they were moving to another hotel.

¹²As set forth below, law enforcement recovered MALIK McKEE’s cellular telephone on April 25, 2012. Law enforcement searched MALIK McKEE’s cellular telephone and located the same photographs of Minor A on MALIK McKEE’s cellular telephone as found on backpage.com advertisements on the Chicago escort section of backpage.com. According to information received from backpage.com, the account that posted those advertisements was attributed to SHUNTINA McKEE.

50. According to Minor A and Minor B, Minor B asked MALIK McKEE to go home several times. Minor A heard MALIK McKEE instruct Minor C to beat Minor B for asking to go home. Minor A saw Minor C hit Minor B.

51. According to Minor B, SHUNTINA McKEE eventually purchased a bus ticket for Minor B to return to Iowa. SHUNTINA McKEE took Minor B to a Greyhound bus station near 95th street in Chicago and bought a ticket for Minor B in the name of "Tina Adams." According to records received from Greyhound, a bus ticket from Chicago, Illinois at 95th Street and the Dan Ryan expressway station to Iowa City, Iowa was purchased in the name of "Tina Adams" on April 14, 2012.

52. According to Minor A, Minor A asked MALIK McKEE several times if she could go home as well. MALIK McKEE refused to allow Minor A to leave and, instead, threatened to beat and kill Minor A and then throw her body in the river when she asked to go home. MALIK McKEE also told Minor A several times that she was not going home.

V. April 25, 2012

53. According to Minor A, on April 25, 2012, she was staying in a hotel room at the Admiral Hotel with MALIK McKEE, SHUNTINA McKEE, Minor C, Individual C, Individual D, and Individual E. Minor A waited until all of the other individuals were asleep and then snuck out of the room and went to the

lobby of the hotel. She took Individual E's phone with her and called her mother, Individual A, from that phone.

54. After speaking with Minor A at the Admiral Hotel on April 25, 2012, CPD officers interviewed Individual E, who requested that officers return her cellular telephone, which had been used by Minor A. Individual E told CPD officers that she had been staying in Room 102 with her friend, SHUNTINA McKEE.

55. CPD officers then went to Room 102. An individual who identified herself as SHUNTINA McKEE answered the door. SHUNTINA McKEE told the officers that the others were located in Room 215. According to records provided to agents and officers by the Admiral Hotel, on April 25, 2012, Room 215 was rented to SHUNTINA McKEE.

56. CPD officers then went to Room 215, where they found individuals who identified themselves as MALIK McKEE, Minor C, Individual C, and Individual D. The individuals found in Room 215 were then transported to the Chicago Police Department to be interviewed.

57. Management staff at the Admiral Hotel later permitted officers to then search Room 215. Officers recovered, among other things:

- a. Two cellular phones and a thumb drive;
- b. condoms; and

- c. women's lingerie.

A. Interview of MALIK McKEE

58. MALIK McKEE waived his Miranda rights and agreed to be interviewed. During the interview, MALIK McKEE made the following statements:

- a. MALIK McKEE said that he had met Minors A and B at a party at his friend's house in Iowa City a month earlier. MALIK McKEE identified his friend as WILLIE WOODS, aka "Uncle Willie."
- b. MALIK McKEE claimed that he showed Minors A and B pictures of his male friends from Chicago that were on his Facebook account. MALIK McKEE stated that Minors A and B asked him to meet his friends for the purpose of having sex with them. MALIK McKEE also stated that Minor C, whom he described as his "Wifey," was also present at the party.
- c. MALIK McKEE paid for Minor B's Greyhound Bus ticket to Chicago.
- d. Once in Chicago, Minor B stayed with SHUNTINA McKEE in a motel. MALIK McKEE set Minor B up with several of his friends so Minor B could have sex with them.

- e. While in Chicago, MALIK McKEE provided ecstasy pills and marijuana to Minors A, B, and C. MALIK McKEE said the girls liked having sex after taking ecstasy pills. MALIK McKEE said that while Minors A and B were in Chicago, they had sex with multiple male friends of McKee's at several motels. MALIK McKEE said Minors A and B "like getting dick in them."
- f. MALIK McKEE said that his friend in Chicago was "fucking" Minor A for weeks.
- g. MALIK McKEE said that while they were at the Admiral Hotel, he overheard Minor A call her mother and tell her that she wanted to come home. MALIK McKEE believed that Minor B told Minor A's mother that Minor A was working as a prostitute in Chicago.
- h. On April 25, 2012, officers also recovered a Pantech Model ADR8995VW cell phone, bearing serial number 113700028433, which was in MALIK McKEE's possession and MALIK McKEE identified it as his cellular telephone.

B. Interview of Minor C

59. Law enforcement also interviewed Minor C on April 25, 2012. Minor C provided the following information:

- a. Minor C said that she lives in Iowa City and was in Chicago with her boyfriend, MALIK McKEE. Minor C said that she was previously in Iowa City with WILLIE WOODS and that WOODS paid for her and Minor A's Greyhound Bus ticket to Chicago.
- b. Minor C admitted to having sex in exchange for money and answering phone calls to set up dates for Minor A and Minor B. Minor C admitted that she told the males who called for dates that it was \$150 for thirty minutes with one of the escorts. Minor C said that during the time with the escorts, the dates would have sex with the escorts. Minor C said that she was able to keep all the tips for herself.

C. Search of MALIK McKEE's Cellular Phone

60. On or about May 11, 2012, U.S. Magistrate Judge Michael T. Mason issued a warrant to search the Pantech Model ADR8995 cellular phone that MALIK McKEE had identified as his.¹³

¹³ The original search warrant for the Pantech Model ADR8995 cellular phone incorrectly identified the IMEI associated with that phone as 113700028433. On May 23, 2012, Magistrate Judge Mason issued an order granting the government's motion to correct the IMEI number associated with this phone to reflect the correct IMEI number, which was 990000680185172.

61. During the search of MALIK McKEE's cellular phone, agents recovered photographs of Minors A and B that were also used in the online advertisements posted on backpage.com.

62. Agents also recovered video of Minor A and Minor C with MALIK McKEE in what appears to be a hotel room.

VI. WOODS Contacts Minor B

63. On or about June 19, 2012, Minor B contacted a special agent with the FBI. While she was in Iowa, Minor B told the special agent that she received a phone call from WOODS, who was using telephone number (XXX) XXX-7637. According to Minor B, during that phone call, WOODS told Minor B not to talk to the police about anything that happened while she was in Iowa City. WOODS told Minor B that if she spoke to anyone about what happened, there would be people out looking for her.

CONCLUSION

64. Based on the foregoing, there is probable cause to believe that MALIK McKEE, SHUNTINA McKEE, and WILLIE WOODS conspired with each other and with others known and unknown to transport minors in interstate commerce with the intent that they engage in prostitution, in violation of Title 18, United States Code, Section 2423(e).

FURTHER AFFIANT SAYETH NOT.

Nikkole Robertson
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me
on this 7th day of September, 2012.

Honorable Arlander Keys
United States Magistrate Judge